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11 *Bankruptcy Counsel to Lead Plaintiff*
12 *and the Proposed Class*

13
14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT of CALIFORNIA**
16

17 In re PG&E CORPORATION,
18 - and -
19 PACIFIC GAS AND ELECTRIC COMPANY,
20 Debtors.
21

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

22 ☒ Affects Both Debtors
23 ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

24 * All papers shall be filed in the lead case,
25 19-30088 (DM)

**NOTICE OF APPEARANCE,
REQUEST FOR SERVICE OF
PAPERS, AND RESERVATION OF
RIGHTS**

26
27 **PLEASE TAKE NOTICE** that the undersigned counsel hereby appear in the chapter 11
28 case (the "Chapter 11 Cases") of the above-captioned debtors in possession (the "Debtors") for and

1 on behalf of Public Employees Retirement Association of New Mexico (“Lead Plaintiff”), the
2 court-appointed lead plaintiff in the securities class action captioned as *In re PG&E Corporation*
3 *Securities Litigation*, Case No. 3:18-cv-03509-RS (the “Securities Litigation”), pending in the
4 United States District Court for the Northern District of California (the “District Court”), pursuant
5 to Section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b)
6 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

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8 **PLEASE TAKE FURTHER NOTICE** that the undersigned counsel, on behalf of Lead
9 Plaintiff and the proposed class in the Securities Litigation (the “Proposed Class”), hereby request
10 service of any and all notices given or required to be given in the Chapter 11 Cases, and all papers
11 served or required to be served in the Chapter 11 Cases, including all adversary proceedings and
12 other related cases and proceedings (collectively, “Related Proceedings”), and request that the
13 names and addresses of the undersigned counsel be added to all mailing matrices and service lists
14 maintained in the Chapter 11 Cases. Service may be made and directed as follows:

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17 **PLEASE TAKE FURTHER NOTICE** that the within request for service includes not
18 only the notices and papers referred to in the Bankruptcy Code, the Bankruptcy Rules, and the
19 Federal Rules of Civil Procedure (wherever applicable), but also includes, without limitation, any
20 notice, application, complaint, demand, motion, petition, pleading or request, whether formal or
21 informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone,
22 telegraph, telex, email, or electronic filing or otherwise filed or made with regard to the Chapter 11
23 Cases or any Related Proceedings, and for the purposes of CM/ECF.

24 **PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and any subsequent
25 appearance, pleading, claim, or suit made or filed by Lead Plaintiff, either individually or for the
26 Proposed Class or any member thereof, do not, shall not, and shall not be deemed to:

- 27 • constitute a submission by Lead Plaintiff, either individually or for the Proposed
28 Class or any member thereof, to the jurisdiction of the Bankruptcy Court;
- constitute consent by Lead Plaintiff, either individually or for the Proposed Class
or any member thereof, to entry by the Bankruptcy Court of any final order in any
non-core proceeding, **which consent is hereby withheld unless, and solely to the**
extent, expressly granted in the future with respect to a specific proceeding;
- waive any substantive or procedural rights of Lead Plaintiff or the Proposed Class
or any member thereof, including but not limited to (a) the right to challenge the
constitutional authority of the Bankruptcy Court to enter a final order or judgment

1 on any matter; (b) the right to have final orders in non-core matters entered only
2 after de novo review by a United States District Court judge; (c) the right to trial by
3 jury in any proceedings so triable herein, in any Related Proceedings, in the
4 Securities Litigation, or in any other case, controversy, or proceeding related to or
5 arising from the Debtors, the Chapter 11 Cases, any Related Proceedings, or the
6 Securities Litigation; (d) the right to seek withdrawal of the bankruptcy reference
7 by a United States District Court in any matter subject to mandatory or discretionary
8 withdrawal; or (e) all other rights, claims, actions, arguments, counterarguments,
9 defenses, setoffs, or recoupments to which Lead Plaintiff or the Proposed Class or
10 any member thereof are or may be entitled under agreements, at law, in equity, or
11 otherwise, all of which rights, claims, actions, arguments, counterarguments,
12 defenses, setoffs, and recoupments are expressly reserved, nor shall this request for
13 notice be deemed to constitute consent to electronic service of any pleading or
14 papers for which mailed or personal service is required under any applicable law.
15 rule, regulation, or order.

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17 Dated: March 29, 2019

MICHELSON LAW GROUP

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19 By: / s / Randy Michelson
20 Randy Michelson
21 Bankruptcy Counsel to Lead Plaintiff
22 and the Proposed Class
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